

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**ICONTROL NETWORKS, INC., a Delaware
corporation,**

Plaintiff,

v.

ZONOFF INC., a Delaware corporation,

Defendant.

CIVIL ACTION

NO. 1:14-CV-1199-GMS

**ZONOFF INC.'S MOTION TO DISMISS
AND FOR A MORE DEFINITE STATEMENT**

Pursuant to Rule 12(b)(6) and 12(e) of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying memorandum in support hereof, defendant Zonoff Inc. ("Zonoff") respectfully moves the Court to dismiss plaintiff iControl Networks, Inc.'s ("iControl") claims for indirect and joint infringement, to dismiss iControl's claim for damages, and to require a more definite statement of the Complaint identifying the specific claims of the six patents-in-suit that are actually being asserted against Zonoff.

DATED: November 7, 2014

/s/ Colm F. Connolly
Colm F. Connolly (I.D. No. 3151)
MORGAN, LEWIS & BOCKIUS LLP
The Nemours Building
1007 North Orange Street, Suite 501
Wilmington, Delaware 19801
302.574.7290
cconnolly@morganlewis.com

and

Thomas B. Kenworthy (Admitted *Pro Hac Vice*)
Kenneth J. Davis (Admitted *Pro Hac Vice*)
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, Pennsylvania 19103-2921
215.963.5000
tkenworthy@morganlewis.com
kdavis@morganlewis.com

*Attorneys for Defendant
Zonoff Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November, 2014, a copy of the foregoing Zonoff Inc.'s Motion To Dismiss And For A More Definite Statement is being served via Hand Delivery to:

Richard K. Herrmann, Esquire
Mary B. Matterer, Esquire
MORRIS JAMES LLP
500 Delaware Avenue, Suite 1500
Wilmington, Delaware 19801

*Attorneys for Plaintiff
iControl Networks, Inc.*

/s/ Colm F. Connolly
COLM F. CONNOLLY